

OUTTEN & GOLDEN LLP

Justin M. Swartz (JS 7989)
Lauren Schwartzreich (LS 8260)
3 Park Avenue, 29th Floor
New York, New York 10016
Telephone: (212) 245-1000
Facsimile: (212) 977-4005

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHUCK MacCONNACH, individually, and on
behalf of a class of other similarly situated
Inside Account Executives,

Plaintiffs,

v.

FIRST FRANKLIN FINANCIAL
CORPORATION, and MERRILL LYNCH &
CO., INC., GLOBAL MARKETS AND
INVESTMENT BANKING GROUP,

Defendants.

Case No. 08-CV-5141

**MOTION TO ADMIT COUNSEL
*PRO HAC VICE***

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, I Justin M. Swartz, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Richard M. Paul III
Stueve Siegel Hanson LLP
460 Nichols Road, Suite 200
Kansas City, MO 64112
Phone: (816) 714-7100
Fax: (816) 714-7101

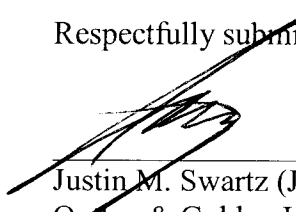
Richard M. Paul III is a member in good standing of the Bar of the State of Missouri. There are no pending disciplinary proceedings against Richard M. Paul III in any State or Federal court.

92-925-658055 JUL 30 2008

Dated: July 28, 2008

City, State: New York, NY

Respectfully submitted,



Justin M. Swartz (JS 7989)
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**AFFIDAVIT OF JUSTIN M. SWARTZ
IN SUPPORT OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

State of New York)
) ss:
County of New York)

Justin M. Swartz, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Outten & Golden LLP, counsel for Plaintiffs in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Richard M. Paul III as counsel *pro hac vice* to represent Plaintiffs in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to the bar of the United States District Court for the Southern District of New York in September 3, 2002, and am in good standing with this Court.
3. I have known Richard M. Paul III for several months.

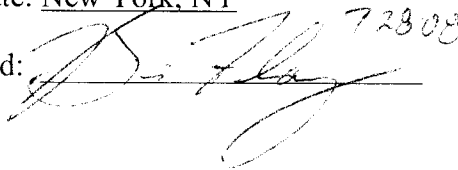
4. Mr. Paul is Of Counsel at Stueve Siegel Hanson LLP, in Kansas City, Missouri.
5. I have found Mr. Paul to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Richard M. Paul III, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of Richard M. Paul III *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Richard M. Paul III *pro hac vice*, to represent Plaintiffs in the above-captioned matter, be granted.

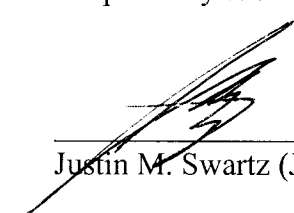
Dated: July 28, 2008

City, State: New York, NY

Notarized:

 72308
BRIAN FLANAGAN
Notary Public, State of New York
King County REG#01FL6160953
My Commission Expires February 12, 2011

Respectfully submitted,


Justin M. Swartz (JS 7989)

OUTTEN & GOLDEN LLP

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Case No. 08-CV-5141

**PROPOSED ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Justin M. Swartz, attorney for Plaintiffs and said sponsor attorney's
affidavit in support:

Richard M. Paul III
Stueve Siegel Hanson LLP
460 Nichols Road, Suite 200
Kansas City, MO 64112
Phone: (816) 714-7100
Fax: (816) 714-7101
paul@stuevesiegel.com

is admitted to practice *pro hac vice* as counsel for Plaintiff, Chuck MacConnach, in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing

(ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov.

Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: _____

So Ordered:

United States District/Magistrate Judge

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA)
)
WESTERN DISTRICT OF MISSOURI) ss.

I, Patricia L. Brune, Clerk of the United States District Court for the Western District of Missouri,



DO HEREBY CERTIFY that Richard M. Paul, III was duly admitted to practice in said Court on November 7, 1996.

Richard M. Paul, III is currently in an active status and has not been disciplined by this Court.

Dated at Kansas City, Missouri
on July 18, 2008

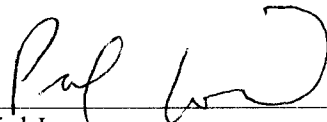
Patricia L. Brune, Court Executive

By Georgia Kee
Georgia Kee, Deputy Clerk

CERTIFICATE OF SERVICE

I, Piel Lora, under penalties of perjury, certify the following as true and correct: I am not a party to this action; and I am over 18 years of age. On this 28 day of July 2008, I served by mail a true and correct copy of the following: (1) Motion to Admit Counsel *Pro Hac Vice*; (2) Affidavit of Justin Swartz in Support of Motion to Admit Counsel *Pro Hac Vice*; and (3) Proposed Order to Admit Counsel *Pro Hac Vice* for Richard M. Paul III, Esq. to the following attorneys of record for FIRST FRANKLIN FINANCIAL CORPORATION, and MERRILL LYNCH & CO., INC., GLOBAL MARKETS AND INVESTMENT BANKING GROUP, defendants in this action, whose last know address is:

A Michael Weber
Lisa Renee Norman
885 Third Avenue, 16th Floor
New York, NY 10022



Piel Lora